

\* California Watershed Network \* Clean Water Action \*  
\* Environmental Justice Coalition for Water \* Planning &  
Conservation League \* Sierra Nevada Alliance \*

April 18th, 2007

Ms. Tracie Billington  
Department of Water Resources  
Division of Planning & Local Assistance  
P.O. Box 942836  
Sacramento CA 94236-0001

Re: proposed changes to IRWM standards and guidelines

Dear Ms. Billington,

On behalf of the above-named organizations, we are submitting the attached recommendations for improvements to the Department's Integrated Regional Water Management (IRWM) program. We have made an effort to distill the comments of our organizations into this letter and the attached documents.

Our organizations have individually submitted recommendations for the IRWM program, so most of these comments should come as no surprise. Accompanying this letter you will find two documents;

- 1) An outline of minimum standards that should be met by IRWM plans prior to the granting of implementation funds;
- 2) An abbreviated list of our major issues that need to be addressed in future program revisions.

We appreciate the efforts that the Department has made to reach out to stakeholders. Our organizations and members have participated in many of the IRWM planning efforts around the state, both good and bad, and welcome the opportunity to share our experience. We strongly support the IRWM program, and our recommendations are intended to make it a continuing and successful program.

We understood that you were too busy to comply with our earlier request for a meeting to discuss our recommendations. Now that the funding area meetings are completed, we are renewing our request for an in-person meeting with staff regarding the future of the IRWM program and our suggested amendments. We would appreciate it if you would contact Jennifer Clary at [jclary@cleanwater.org](mailto:jclary@cleanwater.org) (tele: (415) 369-9160x311) to schedule a meeting.

Sincerely,

Mary Lee Knecht  
California Watershed Network

Jennifer Clary  
Clean Water Action

Debbie Davis  
Environmental Justice Coalition for Water

Charlotte Hodde  
Planning & Conservation League

Joan Clayburgh  
Sierra Nevada Alliance

# **IRWMP Program Recommendations**

*California Watershed Network, Clean Water Action, Environmental Justice Coalition for Water, Sierra Nevada Alliance, Planning and Conservation League*

## **1. Governance Structures for IRWMPs and Stakeholder Involvement**

- Require that IRWMP governance structures include broad stakeholder involvement including NGOs and Disadvantaged Communities.
- Require a detailed Stakeholder Outreach Plan and stipends to involve a broad range of stakeholders
- Require adoption of IRWMP by a broad range of stakeholders representing multiple interests.
- Prohibit “pay-to-play” requirements for an IRWMP governance structure.

## **2. Principles for Equitable Distribution of Prop 84 IRWM Funding**

- Funding should be based on a Competitive Grant Process not the Performance Based Grant Process. The Performance Based process lacks a deadline, pitting everyone in a race to see who can finish their process first and capture the most funding from Funding Area.
- When there are multiple IRWMPs within one Prop 84 Funding Region, funding should be distributed in an agreed equitable distribution across the IRWMPs. If an IRWMP in the region has already received Prop 50 Implementation Funding, the rest of the IRWMPs in that region should have a higher distribution of the funding.
- IRWMPs that did not receive Implementation funding under Prop 50 should be considered first to receive funding under Prop 84.
- DWR should provide technical expertise to launch new IRWMPs – especially in rural and DAC/EJ areas.
- DWR should reserve funding for those regions that currently have no IRWMP, so that each they are able to access it later. Within each funding area, funding should be spread in an equitable manner across the entire area.

## **3. Minimum Standards for Environmental Justice (EJ) Benefits and Participation**

- IRWMPs should identify EJ communities and their needs, develop strategies and projects for addressing those needs within the IRWM plan.
- Stipends should be provided for DAC / EJ representatives to participate in planning meetings
- At least one DAC project must be prioritized among the top 10 projects.
- Unallocated portion of Prop 84 should be used to provide technical assistance to rural areas and disadvantaged communities that have less resources to start up an IRWMP.

## **4. “Readiness to proceed” Should be Thrown Out as an Evaluation Criteria**

- The “Readiness to Proceed” criteria requires CEQA to be done before applying to DWR for Implementation funding. This is not feasible for rural and DAC/EJ project proponents. This criteria should be thrown out as it biases implementation severely towards groups with more resources. Projects should be evaluated based on workplans, schedule and funding deadlines as a means of assuring the appropriate expenditure of grant funds. This allows means the state will fund projects that might not otherwise be built rather than those that will get built regardless of state funding.

## **5. Raise the Evaluation Standard for Integration**

- Projects should address multiple water issues and provide benefits to multiple interest groups ie. water agencies, conservation groups, recreation groups, agriculture, federal and state land managers and counties at a high level of integration. Evaluations should award more points for projects that are addressing multiple issues with a collaborative project team with representatives from different sectors (ie. water agencies, NGOs, DAC/EJ, agriculture, and Counties).
- Evaluations should award more points for projects that are of regional significance because proponents are collaborating across sectors or jurisdictional lines to impact the entire region or their project is a pilot and the results or methodology are needed in the rest of the region.

## **6. Incorporate Climate Change as a Regional Priority**

- IRWM planning efforts should encourage projects that respond to and seek to adapt to regional climate change impacts by increasing the resiliency of the natural hydrologic system and ecosystem as priorities.

## **7. Prioritize Public Health Strategies and Projects**

- Projects should be evaluated under public health priorities in terms of safety, potable drinking water, and water and fish contamination. Projects that rectify a public health problem should be prioritized.

**April 18, 2007**

## **Minimum Standards for IRWM Plans**

*Prepared by: Clean Water Action, Environmental Justice Coalition for Water, Sierra Nevada Alliance, Planning and Conservation League, California Watershed Network*

- I. Objectives
  - a. Plan must include quantitative objectives and performance measures
  - b. Identification and prioritization of projects must be based on meeting objectives.
- II. Stakeholder Involvement
  - a. Plans must
    - i. Identify the full range of potential stakeholders, including
      - 1. Land use and water agencies
      - 2. NGOs – environmental, watershed
      - 3. Government – local, state, federal
      - 4. Business
      - 5. Agriculture
      - 6. EJ and other impacted communities
    - ii. Outline the methods used to identify and engage identified stakeholders, including payment of stipends for full participation
    - iii. Identify what level of engagement stakeholders were offered
      - 1. Information only – newsletters, website
      - 2. Direct contact with request for input – invitations to workshops, meetings, phone interviews, surveys
      - 3. Limited participation in plan development
      - 4. Full participation in plan development, including participation on the decision-making body, plan adoption by entities, and project authorship / partnership.
    - iv. Report on the results of their outreach in terms of
      - 1. # of stakeholders identified
      - 2. # of stakeholders interviewed
      - 3. # and role of stakeholders in plan development, project identification, and plan implementation
- III. Identification of water needs. Plans must
  - a. To the extent possible, identify all agencies with authority over water management in the region
  - b. Include identification and needs assessment of environmental justice and disadvantaged communities in the region, and an explanation of how these needs will be addressed and impacts avoided through plan implementation.
  - c. Prioritize projects that address multiple water issues and which provide benefits to multiple interest groups ie. water agencies, conservation groups, recreation groups, agriculture, federal and state land managers and

counties. The Plan should demonstrate that the claimed benefits genuinely accrue to multiple interest groups by demonstrating project partners that represent those interests or if they are not project partners, submitting letters of support from representatives of those multiple interests.

IV. Implementation Plan must include the following;

- a. Written agreement outlining decision-making mechanism and authority;
- b. Schedule, budget, and funding source for plan implementation and governance;
- c. Mechanism for measuring achievement of objectives;
- d. Mechanism for amending the plan as needed;
- e. Decision-making process, based on the following minimum guidelines;
  - i. Decision making authority cannot be based on an entity's monetary contribution to the process.
  - ii. NGO Representatives (environmental, watershed and Environmental Justice organizations, for example) must be represented in the decision-making process.
  - iii. Government Agencies with regulatory authority over water must play at least an advisory role in governance.
- f. Mechanism whereby those agencies whose authority encompasses the issues covered by the IRWM Plan, but who may not be directly involved (including all types of water agencies, local and county land use agencies, and city and county governments) are kept informed of plan activities and decisions and encouraged to comment on actions.
- g. Stakeholder role. Plan implementation must contain avenues for stakeholder engagement at the following levels
  1. Make information on the plan, projects and meetings publicly available.
  2. Publicly notice all governance meetings, both electronically and in media outlets targeted to environmental justice communities in the region
  3. Include mechanism for proactively updating stakeholders
  4. Include representatives of stakeholder groups in governance structure